

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)**

Case No. 3:23-md-03071
MDL No. 3071

This Document Relates to:
All Cases

Chief Judge Waverly D. Crenshaw, Jr.

**DEFENDANT CWS APARTMENT HOMES LLC'S UNOPPOSED MOTION
TO EXTEND THE STRUCTURED DATA PRODUCTION DEADLINE**

Defendant CWS Apartment Homes LLC ("CWS") submits this Unopposed Motion to Extend the Structured Data Production Deadline. The current deadline is December 20, 2024. Similar to other defendants that have filed extension motions today, CWS seeks an extension of the structured data deadline to January 15, 2025. The modification is supported by good cause and compliance with Local Rule 16.01(h)(1). Plaintiffs do not oppose the relief requested in this motion.

I. Background

1. The Case Management Order ("CMO") and later docket entry (Dkt. 1005) modifying the CMO set the current deadline for structured data production as December 20, 2024.

2. The CMO, as modified, includes the following deadlines:

Deadline	Date
First Set of Structured Data Production	12/20/2024*
Completion of Document Production	3/28/2025
Requests for Admission	8/21/2025
Fact Discovery Deadline	11/21/2025
Expert Opening Reports	2/19/2026
Expert Rebuttal Reports	4/20/2026
Reply Reports	6/4/2026
Opening Motion for Class Certification	7/20/2026
Daubert Motions – Opening Reports	7/20/2026

Opposition to Motion for Class Certification	9/7/2026
Daubert Motions – Rebuttal Reports; Opposition to Opening Report Motions	9/7/2026
Reply in Support of Motion for Class Certification	10/7/2026
Daubert Motions – Opposition to Rebuttal Report Motions; Replies in Support of Opening Report Motions	10/7/2026
Daubert Motions – Replies to Support Rebuttal Report Motions	11/6/2026
Hearing on Class Certification and Daubert	November or December, 2026
Motions for Summary Judgment & Statement of Undisputed Material Facts	3/1/2027
Responses to Summary Judgment Motions & Statements of Undisputed Material Facts	4/30/2027
Replies to Summary Judgment Motions	6/14/2027
Argument on Summary Judgment Motions	7/15/2027- 7/16/2027
Mediation and Case Resolution Efforts	8/13/2027
Trial Ready	10/1/2027
Jury Instructions; Witness and Exhibit Lists; Stipulations; Expert Reports	1/10/2028
Final Pretrial Conference	1/18/2028- 1/19/2029
Jury Trial	2/1/2028

3. CWS has produced samples of structured data to Plaintiffs and has met and conferred with Plaintiffs' counsel numerous times regarding the content and form of its structured data production.

4. CWS relies on a small number of employees to pull relevant responsive structured data and those individuals have worked diligently in pulling this data in addition to their primary responsibilities in their roles at CWS.

5. CWS is engaged in active settlement discussions with Plaintiffs.

II. Good Cause Exists and No Prejudice to Any Party

6. CWS's request is made in good faith and to facilitate settlement discussions.

7. Extending the deadline to January 15, 2025, will enable CWS to maintain its focus on settlement efforts and support the parties' shared goal of reaching resolution.

8. Plaintiffs do not oppose this requested extension, and the affected parties will not suffer prejudice from this extension.

9. No other CMO deadlines will be impacted by the grant of this motion.

III. Compliance with Local Rule 16.01(h)(1)

10. Local Rule 16.01(h)(1) requires that no dispositive motion deadline be later than 90 days in advance of the trial date; the CMO requires that a motion to modify the CMO include a statement that a requested modification maintains conformity to this requirement. (Dkt. 818 at 1.) Accordingly, CWS affirms that an extension of the structured data deadline to January 15, 2025, as to CWS, does not impact the current dispositive motion deadlines, and therefore complies with Local Rule 16.01(h)(1).

IV. Conclusion

For the foregoing reasons, CWS respectfully requests that the Court extend CWS's deadline for production of structured data from December 20, 2024, to January 15, 2025.

Dated: December 20, 2024

Respectfully submitted,

/s/ Michael K. Molzberger

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CERTIFICATE OF SERVICE

I, Michael K. Molzberger, hereby certify that on December 20, 2024 I caused the foregoing document to be served on all counsel of record via the CM/ECF system and via Plaintiffs' counsel email list-serv (RealPageCoCounsel@scott-scott.com).

/s/ Michael K. Molzberger

Michael K. Molzberger